

Exhibit A




From: [Lina Cohen](#)
To: ["eduardo@ayalalawpa.com"](#); ["Luis Quesada"](#); [rsawal@ayalalawpa.com](#); ["sgarcia@ayalalawpa.com"](#)
Cc: [Jeff Gutches](#); [Joshua Shore](#); [Jenna Ferolie](#); [Alice Ferot](#)
Subject: SERVICE OF COURT DOCUMENT - Griffin v. Motorsport Games (24-cv-21929)
Date: Monday, November 25, 2024 2:36:13 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[2024 11 25 \(MSG\) Proposal for Settlement.pdf](#)

Defendant serves the attached via email:

Court:	In the United States District Court for the Southern District of Florida
Case No.:	24-cv-21929
Re:	<i>Griffin v. Motorsport Games</i>
Title of Document Being Served:	Defendant's Proposal for Settlement Florida Rule of Civil Procedure 1.442 and Florida Statute §768.79
Sender's Name:	Lina Cohen
Sender's Phone:	(305) 297-1878
Sender's Email:	lina@axslawgroup.com

Lina Cohen



 lina@axslawgroup.com
 [305.297.1878](tel:305.297.1878)
 2121 NW 2nd Avenue, Suite 201, Miami, FL 33127



AXS Law Group PLLC



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No.: 1:24-cv-21929-Bloom**

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

**DEFENDANT MOTORSPORT GAMES INC.'S
PROPOSAL FOR SETTLEMENT TO PLAINTIFF ZACHARY GRIFFIN**

Defendant Motorsport Games Inc. ("MSG"), by and through their undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.442 and Florida Statute §768.79, hereby submits the following Proposal for Settlement to Plaintiff Zachary Griffin ("Griffin"):

1. This Proposal for Settlement ("Proposal") is made pursuant to Florida Rule of Civil Procedure 1.442 and Florida Statute §768.79.
2. This Proposal is not served earlier than ninety (90) days after service of process on Defendant MSG, and this Proposal is not served later than forty-five (45) days before trial.
3. The party making this Proposal is Defendant MSG.
4. The party to whom this Proposal is being made is Plaintiff Griffin.
5. Attorneys' fees are not part of Plaintiff Griffin's claim against Defendant MSG.
6. This Proposal is being made to resolve all of Plaintiff's alleged damages, if any, that could otherwise be awarded in a final judgment in this lawsuit, including, without limitation, damages, costs and interest and any and all claims of Plaintiff Griffin against Defendant MSG, including any claim to attorneys' fees, arising out of the facts alleged in this lawsuit or which could have been raised by Plaintiff Griffin against Defendant MSG.

7. The relevant conditions of this Proposal include: (a) Defendant MSG will pay the settlement proceeds to Plaintiff Griffin's counsel within 45 days of Plaintiff Griffin's written acceptance of this Proposal; (b) upon receipt of the settlement funds, Plaintiff Griffin shall voluntarily dismiss with prejudice its claims in this litigation against Defendant MSG.

8. The total amount of this Proposal is Twenty Five Thousand Dollars (\$25,000), which amount shall be attributed in the following manner: Twenty Five Thousand Dollars (\$25,000) from Defendant MSG to Plaintiff Griffin.

9. All relevant conditions and non-monetary terms have been stated above.

10. None of the money offered in this Proposal is related to a claim for punitive damages because there is no claim for punitive damages in this case.

11. To be binding, the Plaintiff must accept this Proposal in writing within thirty (30) days after service.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 25, 2024, undersigned counsel served the foregoing document via email on Plaintiff Griffin's counsel: Eduardo A. Maura, Esq., Luis F. Quesada Machado, Esq., Ryan M. Sawal, Esq., Ayala Law, P.A., 2490 Coral Way, Suite 401, Miami, FL 33145 (emails: eduardo@ayalalawpa.com; lquesada@ayalalawpa.com; rsawal@ayalalawpa.com).

By: /s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess
Fla. Bar No. 702641
Jeff@axslawgroup.com
2121 NW 2nd Ave
Miami, FL 33127
Tel: (305)-297-1878
Counsel for Defendant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 24-cv-21929-BLOOM/Elfenbein**

ZACHARY GRIFFIN,

Plaintiff,

V.

MOTORSPORT GAMES INC.,

Defendant.

**DEFENDANT MOTORSPORT GAMES INC.'S NOTICE OF SERVING
PROPOSAL FOR SETTLEMENT TO PLAINTIFF ZACHARY GRIFFIN**

Defendant Motorsport Games Inc., by and through their undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.442 and Florida Statute §768.79, hereby gives notice that on this date it served a Proposal for Settlement to Plaintiff Zachary Griffin.

Dated: November 25, 2024.

Respectfully submitted,

AXS LAW GROUP, PLLC
2121 NW 2nd Ave, Suite 201
Miami, Florida 33127
Telephone: (305) 297-1878

By: /s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess, Esq.
Florida Bar No. 702641
jeff@axslawgroup.com
eservice@axslawgroup.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 25, 2024, all parties of record were served via filing of the above Notice on the CM/ECF system.

/s/ Jeffrey W. Gutchess
Jeffrey W. Gutchess